

EXHIBIT D

BOIES SCHILLER FLEXNER LLP

David Boies (*pro hac vice*)
333 Main Street
Armonk, NY 10504
(914) 749-8200
dboies@bsfllp.com

Maxwell V. Pritt (SBN 253155)
Joshua I. Schiller (SBN 330653)
Joshua M. Stein (SBN 298856)
44 Montgomery Street, 41st Floor
San Francisco, CA 94104
(415) 293-6800
mpritt@bsfllp.com
jischiller@bsfllp.com
jstein@bsfllp.com

Jesse Panuccio (*pro hac vice*)
1401 New York Ave, NW
Washington, DC 20005
(202) 237-2727
jpanuccio@bsfllp.com

David L. Simons (*pro hac vice*)
55 Hudson Yards, 20th Floor
New York, NY 10001
(914) 749-8200
dsimons@bsfllp.com

*Counsel for Individual and Representative Plaintiffs
and the Proposed Class. (additional counsel included below)*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

Richard Kadrey, et al.,

Individual and Representative Plaintiffs,

v.

Meta Platforms, Inc.,

Defendant.

JOSEPH SAVERI LAW FIRM, LLP

Joseph R. Saveri (SBN 130064)
Cadio Zirpoli (SBN 179108)
Christopher K.L. Young (SBN 318371)
Holden Benon (SBN 325847)
Aaron Cera (SBN 351163)
601 California Street, Suite 1505
San Francisco, California 94108
(415) 500-6800
jsaveri@saverilawfirm.com
czirpoli@saverilawfirm.com
cyoung@saverilawfirm.com
hbenon@saverilawfirm.com
acera@saverilawfirm.com

Matthew Butterick (SBN 250953)
1920 Hillhurst Avenue, #406
Los Angeles, CA 90027
(323) 968-2632
mb@buttericklaw.com

**CAFFERTY CLOBES MERIWETHER &
SPRENGEL LLP**

Bryan L. Clobes (*pro hac vice*)
135 S. LaSalle Street, Suite 3210
Chicago, IL 60603
(312)-782-4880
bclobes@caffertyclobes.com

Case No. 3:23-cv-03417-VC

**PLAINTIFFS' FIFTH SET OF REQUESTS
FOR PRODUCTION TO DEFENDANT
META**

REQUESTS FOR PRODUCTION OF DOCUMENTS

REQUEST FOR PRODUCTION NO. 79

All Documents and Communications related to the decision to describe the Books3 database as “publicly available” in the Llama 1 Paper.

REQUEST FOR PRODUCTION NO. 80

All Documents and Communications related to the decision to describe the Books3 database as “publicly available” in the Llama 2 Paper.

REQUEST FOR PRODUCTION NO. 81

All Documents and Communications related to the decision to use Shadow Datasets for training Llama Models.

REQUEST FOR PRODUCTION NO. 82

All Documents and Communications related to the role of EleutherAI in the acquisition and use of Books3.

REQUEST FOR PRODUCTION NO. 83

All Documents and Communications related to the role of The Eye in the distribution of Books3.

REQUEST FOR PRODUCTION NO. 84

All Documents and Communications related to the role of Hugging Face in the distribution of Books3.

REQUEST FOR PRODUCTION NO. 85

All Documents and Communications related to the decision to use Torrent Systems to acquire data for training Llama Models.

REQUEST FOR PRODUCTION NO. 86

All Documents and Communications related to the decision to use books for long-range context modeling research.

REQUEST FOR PRODUCTION NO. 87

All Documents and Communications related to the decision to use books for coherent storytelling in the training of Llama Models.

REQUEST FOR PRODUCTION NO. 129

Documents sufficient to identify all individuals, currently or formerly employed by Meta, including their roles and titles, who work or worked on Meta's AI research and development projects, including Llama models, and/or on Meta's licensing efforts with respect to AI training data.

REQUEST FOR PRODUCTION NO. 130

All Documents and Communications, including discussions, deliberations, or negotiations related to any actual, proposed, or contemplated licensing agreements (even if never written or executed) for AI training data, including any actual, proposed, or contemplated terms, conditions, and consideration.

Dated: October 9, 2024

By: /s/ David L. Simons

JOSEPH SAVERI LAW FIRM, LLP

Joseph R. Saveri (SBN 130064)
 Cadio Zirpoli (SBN 179108)
 Christopher K.L. Young (SBN 318371)
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 Aaron Cera (SBN 351163)
 601 California Street, Suite 1505
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 jsaveri@saverilawfirm.com
 czirpoli@saverilawfirm.com
 cyoung@saverilawfirm.com
 hbenon@saverilawfirm.com
 acera@saverilawfirm.com

Matthew Butterick (SBN 250953)
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 Los Angeles, CA 90027
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 jschiller@bsfllp.com
 jstein@bsfllp.com

Jesse Panuccio (*pro hac vice*)
 1401 New York Ave, NW
 Washington, DC 20005

**CAFFERTY CLOBES MERIWETHER &
SPRENGEL LLP**

Bryan L. Clobes (*pro hac vice*)
135 S. LaSalle Street, Suite 3210
Chicago, IL 60603
(312)-782-4880
bclobes@caffertyclobes.com

(202) 237-2727
jpanuccio@bsfllp.com

David L. Simons (*pro hac vice*)
55 Hudson Yards, 20th Floor
New York, NY 10001
(914) 749-8200
dsimons@bsfllp.com

DICELLO LEVITT LLP

Amy Keller (*pro hac vice*)
Nada Djordjevic (*pro hac vice*)
James Ulwick (*pro hac vice*)
(312) 214-7900
akeller@dicellolevitt.com
ndjordjevic@dicellolevitt.com
julwick@dicellolevitt.com
10 North Dearborn Street, Sixth Floor
Chicago, Illinois 60602

David Straite (*pro hac vice*)
(646) 933-1000
dsraite@dicellolevitt.com
485 Lexington Avenue
Suite 1001
New York, New York 10017

CERTIFICATE OF SERVICE

I, the undersigned, am employed by the Boies Schiller Flexner LLP. My business address is 55 Hudson Yards, New York, NY 10001. I am over the age of eighteen and not a party to this action.

On October 9, 2024, I caused the following documents to be served by email upon the parties listed on the attached Service List:

- **PLAINTIFFS' FIFTH SET OF REQUESTS FOR PRODUCTION TO DEFENDANT META**

I declare under penalty of perjury that the foregoing is true and correct. Executed on October 9, 2024.

/s/ David L. Simons

SERVICE LIST

Bobby A. Ghajar
Colette Ani Ghazarian

COOLEY LLP

1333 2nd Street, Suite 400
Santa Monica, CA 90401
Email: bghajar@cooley.com
cghazarian@cooley.com

Kathleen R. Hartnett

COOLEY LLP

3 Embarcadero Center, 20th Floor
San Francisco, CA 94111-4004
Email: khartnett@cooley.com

Judd D. Lauter

COOLEY LLP

3175 Hanover Street
Palo Alto, CA 94304
Email: jlauter@cooley.com

Mark Alan Lemley

LEX LUMINA PLLC

745 Fifth Avenue, Suite 500
New York, NY 10151
Email: mlemley@lex-lumina.com

Angela L. Dunning

**CLEARY GOTTlieb STEEN &
HAMILTON LLP**

1841 Page Mill Road
Palo Alto, CA 94304-1254
Email: adunning@cgsh.com

*Counsel for Defendant
Meta Platforms, Inc.*